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March 4, 2022

**VIA ECF**

Hon. Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: Moreno-Godoy v. Gallet Dreyer & Berkey, LLP, 14 Civ. 7082 (PAE)  
Our File No. 20062.003

Dear Judge Engelmayer:

We represent defendant Gallet Dreyer & Berkey, LLP in this matter. Plaintiff's counsel requires additional time to confer with their client, Luis Felipe Moreno-Godoy, who is incarcerated in FCI Talladega, concerning the Rule 68 Offer of Judgment for *complete relief* served by the Defendants. Accordingly, on behalf of all of the Defendants, we request a further seven-day extension of the deadline to oppose the outstanding motions *in limine* from March 9, until March 16, 2022. Plaintiff's counsel consents to the adjournment. We previously received an adjournment of the original opposition deadline on March 1, 2022, and this request was granted.

We believe that these "extraordinary circumstances" merit a further extension. On February 23, 2022, the Defendants served a Rule 68 Offer of Judgment upon counsel for Plaintiff, offering *complete relief* on the Plaintiff's remaining claims against the Defendants. In the event that the Plaintiff accepts this Offer of Judgment, the parties will avoid the necessity for motions *in limine* and trial, and conserve scarce judicial resources that are already spread thin in this district. Our efforts to obtain a quick determination of the Plaintiff's position on the Offer of Judgment is also complicated by the difficulty that Plaintiff's counsel is having in communicating with their client who is incarcerated in Talladega Alabama.

We thank the Court for its attention to this matter.

Respectfully submitted,

Jared B. Foley

cc: All Counsel (via ECF)